
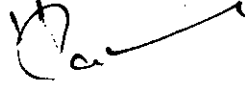


01.08.2018


Appellant absent. Learned counsel for the appellant and Mr. Kabirullah Khattak, Additional AG alongwith Mr. Farmani Gul, S.I for the respondents present. Learned counsel for the appellant seeks adjournment. Adjourned. To come up for arguments on 24.09.2018 before D.B.


(Ahmad Hassan)
Member (E)


(Muhammad Hamid Mughal)
Member (J)

24.09.2018

Learned counsel for the appellant present. Mr. Zia Ullah learned Deputy District Attorney alongwith Mr. Farmani Gul S.I for the respondents present, submitted copy of order dated 20.03.2017 of respondent No.1 and stated that consequent upon the departmental appeal of the appellant under Rule 11-A of the Khyber Pakhtunkhwa Police Rules 1975, the appellant has been reinstated in service on the strength of the said order and as such the present service appeal has become infructuous. Learned counsel for the appellant also conceded the plea taken by the learned Deputy District Attorney that in view of the order dated 20.03.2017 mentioned above passed during the pendency of the present service appeal, the same has become infructuous. Consequently the present service appeal is hereby dismissed having become infructuous. No order as to costs. File be consigned to the record room.


(Hussain Shah)
Member


(Muhammad Hamid Mughal)
Member


ANNOUNCED
24.09.2018

S.A1240/2015

31.01.2018


Learned counsel for the appellant and Mr. Zia Ullah, Learned Deputy District Attorney alongwith Bashir Ahmad S.I for respondents present. Learned counsel for the appellant seeks adjournment. Adjourned. To come up for arguments on 04.04.2018 before D.B



(Muhammad Amin Kundi)
MEMBER


(Muhammad Hamid Mughal)
MEMBER

04.04.2018


Counsel for the appellant and Addl; AG for respondents present. Representative of the respondents not present. Representative of the respondent be summoned in person with the directions to produce complete record of the appellant on the next date of hearing. Adjourned. To come up for record and arguments on 01.06.2018 before D.B.


(Ahmad Hassan)
Member


(M. Hamid Mughal)
Member

01.06.2018

Counsel for the appellant and Mr. Muhammad Jan, DDA alongwith Mr. Farman Ali, S.I for official respondents present. Representative of the respondent department seeks adjournment to produce complete record on the next date of hearing. Adjourned. To come up for arguments on 1-8-2018 before D.B.


(M. Amin Khan Kundi)
Member


(M. Hamid Mughal)
Member

22.05.2017


Counsel for the appellant and Mr. Muhammad Adeel Butt
Additional AG for the respondent present. Requested for
adjournment. Adjourned. To come up for rejoinder and arguments
on 05.09.2017 before D.B.



(Gul Zeb Khan)
Member


(Muhammad Amin Khan Kundi)
Member

05.09.2017


Clerk of the counsel for appellant present. Mr. Kabir Ullah
Khatta, Assistant Advocate General for the respondents present. Clerk of
the counsel for appellant seeks adjournment. Adjourned. To come up for
arguments on 24.11.2017 before D.B.


(Muhammad Amin Kundi Khan)
Member


(Muhammad Hamid Mughal)
Member

24.11.2017

Learned Counsel for the appellant present. Mr. Zia
Ullah; Learned Deputy District Attorney for the
respondents present. Learned counsel for the appellant
requested for adjournment. Adjourned. To come up for
arguments on 31.01.2018 before D.B.


(Gul Zeb Khan)

MEMBER


(MUHAMMAD HAMID MUGHAL)

MEMBER

1240/2016

07.03.2017

Appellant through learned counsel present. Preliminary arguments heard. Appellant (Head Constable) was dismissed from service on 21.06.2016 on various charges of misconduct. He had preferred departmental appeal and service appeal in time. The learned counsel for appellant submitted that no proper opportunity was extended to him and that the inquiry was not conducted in transparent manner.


Point raised needs consideration. The appeal is admitted for regular hearing. The appellant is directed to deposit the security and process fee within 10 days thereafter notices be issued to the respondents for written reply/comments for 17.04.2017 before S.B.

Appellant Deposited
Security & Process Fee


(ASHFAQUE TAJ)
MEMBER

17.04.2017

Counsel for the appellant and Mr. Bashir Ahmad, ASI alongwith Addl. AG for the respondents present. Written reply submitted. To come up for rejoinder and arguments on 22.05.2017.


(Muhammad Amin Khan Kundi)

Member

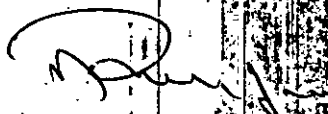
05.01.2017

Counsel for the appellant present and requested for adjournment. Request accepted. To come up for preliminary hearing on 13-2-17 before S.B.

(MUHAMMAD AAMIR NAZIR)
MEMBER

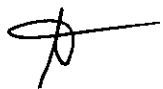
13.02.2017

Clerk to counsel for the appellant present. Clerk to counsel for the appellant requested for adjournment. Request accepted. To come up for preliminary hearing on 22.02.2017 before S.B.


(ASHFAQUE TA)
MEMBER

22.02.2017

Clerk to counsel for the appellant present. Preliminary arguments could not be heard due to general strike of the bar. To come up for preliminary hearing on 07.03.2017 before S.B.

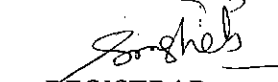
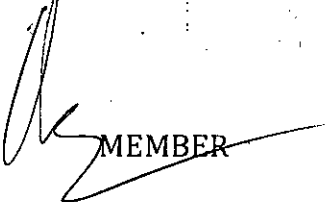
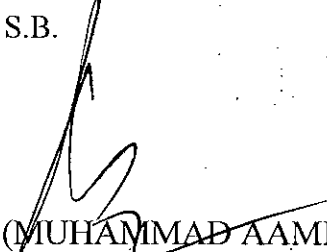

(AHMAD HASSAN)
MEMBER

Form- A

FORM OF ORDER SHEET

Court of MPA-2

Case No. 1240/2016

S.No.	Date of order proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	16/12/2016	<p>The appeal of Mr. Khaled Khan presented today by Mr. Shahzada Irfan Zia Advocate may be entered in the Institution Register and put up to the Learned Member for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p>
2-	19-12-2016	<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>22-12-2016</u></p> <p style="text-align: right;"> MEMBER</p>
	22.12.2016	<p>Counsel for the appellant present. Requested for adjournment. Request accepted. To come up for preliminary hearing on 05.01.2017 before S.B.</p> <p style="text-align: right;"> (MUHAMMAD AAMIR NAZIR) MEMBER</p>

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

IN RE:
Service Appeal No. 1240 / of 2016

Khalid Khan Ex. Head Constable Appellant

VERSUS

Province of Khyber Pakhtunkhwa, through
Inspector General of Police and others... .. Respondents

INDEX

S.No	Description of documents	Annexures	Pages
1.	Body of Appeal		1 - 4
2.	Charge Sheet	'A'	0 - 5
3.	Statement of Allegations	'B'	0 - 6
4.	Reply to the Charge Sheet	'C'	0 - 7
5.	Inquiry Report	'D'	8 - 10
6.	Show Cause Notice	'E'	0 - 11
7.	Reply to Show Cause Notice	'F'	0 - 12
8.	Impugned Order	'G'	13 - 14
9.	Departmental Appeal	'H'	0 - 15
10.	Final Order	'I'	0 - 16
11.	Medical Certificates	'J'	17 - 23
12.	Vakalat Nama		

Through:

Khalid Khan
Appellant

(Shahzada Irfan Zia)
Advocate High Court
13-C Haroon Mansion,
Khyber Bazar, Peshawar.
Cell # 0300-9345297

Dated: 16.12.2016

①

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

Khyber Pakhtunkhwa
Service Tribunal

Service Appeal No. 1240 / of 2016

Diary No. 1296

Dated 16-12-2016

Khalid Khan Ex. Head Constable
No. 5610/¹⁰ Traffic Police, Peshawar...

Appellant

VERSUS

1. Province of Khyber Pakhtunkhwa
Through Inspector General of Police/
Provincial Police Officer,
Khyber Pakhtunkhwa, Peshawar.
2. Capital City Police Officer, Peshawar.
3. Senior Superintendent of Police,
Traffic, Peshawar...

Respondents

APPEAL UNDER SECTION 4 OF KHYBER
PAKHTUNKHWA SERVICE TRIBUNAL ACT 1974
AGAINST THE IMPUGNED ORDER DATED 21.06.2016
WHEREBY THE APPELLANT HAS BEEN DISMISSED
FROM SERVICE AND HIS DEPARTMENTAL APPEAL
WAS ALSO REJECTED BY RESPONDENT NO.2 VIDE
ORDER DATED 17.11.2016.

Respectfully Sheweth:

Filed today
Sandhu
16-12-16
Registrar

FACTS OF THE CASE.

1. That succinctly the facts which formed the background of this case are that the appellant while serving as Head Constable a Charge Sheet alongwith statement of allegations was served upon the appellant. The appellant submitted his reply to the Charge Sheet and vindicated his

plea and position. He vehemently denied the alleged charges but to his utter dismay that his reply went unheeded. (Annexs: A, B&C).

2. That an Inquiry Committee was constituted to probe into the matter. The Inquiry Committee recorded the written statements of the appellant alongwith a number of witnesses/officials, who deposed against the appellant and recorded false statements against him just to save their own skin. It is strange that no opportunity of cross-examination was given to the appellant against the said officials deposed against him and the Inquiry Committee made all possible efforts to prove the appellant guilty. (Annex: D). It is merit to mention that the copies of the statements were not supplied to the appellant, therefore, he has been deprived of his proper defence in the case.
3. That a final Show Cause Notice was served upon the appellant which he properly replied and again denied the alleged charges, but unfortunately the respondent No.3 on 21.06.2016 passed the impugned order whereby he dismissed the appellant from service. (Annexs: E, F&G).
4. That feeling aggrieved from the impugned order dated 21.06.2016 the appellant filed his Departmental Appeal before respondent No.2 but the same was rejected by respondent No.2 vide order dated 17.11.2016, hence the present appeal is being filed inter alia on the following grounds:- (Annexs: H&I).

plea and position. He vehemently denied the alleged charges but to his utter dismay that his reply went unheeded. (Annexs: A, B&C).

2. That an Inquiry Committee was constituted to probe into the matter. The Inquiry Committee recorded the written statements of the appellant alongwith a number of witnesses/officials, who deposed against the appellant and recorded false statements against him just to save their own skin. It is strange that no opportunity of cross-examination was given to the appellant against the said officials deposed against him and the Inquiry Committee made all possible efforts to prove the appellant guilty. (Annex: D). It is merit to mention that the copies of the statements were not supplied to the appellant, therefore, he has been deprived of his proper defence in the case.
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4. That feeling aggrieved from the impugned order dated 21.06.2016 the appellant filed his Departmental Appeal before respondent No.2 but the same was rejected by respondent No.2 vide order dated 17.11.2016, hence the present appeal is being filed inter alia on the following grounds:- (Annexs: H&I).

GROUND:

- a. That during the inquiry proceedings witnesses were examined but no opportunity of cross-examination of the witnesses was given to the appellant/accused which is a mandatory requirement under the Police Disciplinary Rules 1975. Due to this omission the appellant was deprived of his proper defense, hence the Inquiry Proceedings are smoke screen and a pre-determined decision, therefore, unsustainable under the law.
- b. That the witnesses deposed against the appellant and recorded their false statements which are against the logic and the Inquiry Officer was unable to dig out the truth. It is logically impossible that a person made bogus signatures of different officers and affixed their stamps without their knowledge. The statements of all the officials/witnesses are doubtful.
- c. That the appellant was fell ill severely and he was suffering from Typhoid, therefore, he applied for leave time and again which was sanctioned accordingly by the competent authority, thus the allegations are baseless. (Annex: J).
- d. That it was legal obligation of the Inquiry Officer to justify the real position. The disputed signatures of the officers involved should have referred to the FSL/Hand Writing Expert for verification but this legal requirement remained omitted, therefore, the net result cannot be achieved except presumptions,

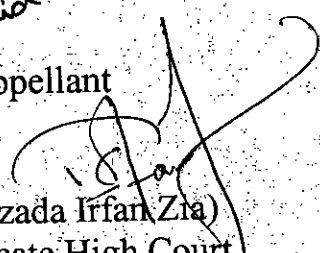
which are not of any legal effect. In such circumstances the inquiry report cannot be relied upon.

- e. That the appellant seeks permission of this Honourable Tribunal to raise more legal grounds at the time of arguments.

In view of the matter and aforementioned facts and circumstances of the case it is, therefore, most humbly prayed that the impugned order dated 21.06.2016 passed by respondent No.3 and final order dated 17.11.2016 passed by respondent No.2 may graciously be set aside being illegal and void, directing the respondents to reinstate the appellant into service with all consequential benefits.

Any other relief though not specifically asked for to which the appellant is found entitled in the circumstances of the case may also be granted to the appellant.

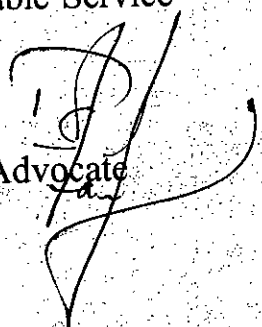
Through:

Khalid Khan
 Appellant

 (Shahzada Irfan Zia)
 Advocate High Court,
 13-C Haroon Mansion,
 Khyber Bazar, Peshawar.
 Cell # 0300-9345297

Dated: 16.12.2016

CERTIFICATE:

Certified that as per instructions of my client, no such Service Appeal on behalf of the appellant has earlier been filed in this Honourable Service Tribunal on the subject matter.


 Advocate

CHARGE SHEET

1. WHEREAS I am satisfied that a formal enquiry as contemplated by Police Rules 1975 is necessary and expedient.

2. AND whereas, I am of the view that the allegations if established would call for major/minor penalty, as defined in Rule-3 of the aforesaid Rules.


3. Now therefore, as required by Rule 6 (1) (a) & (b) of the said Rules I, **SADIQ HUSSAIN**, Senior Superintendent of Police, Traffic, Peshawar hereby charge you **HC Khalid Khan No.5610/10** under Rules 5 (4) of the Police Rules 1975 on the basis of following allegations:-

i) That from 14.10.2015 to 03.06.2016 (231-days) you have submitted bogus medical documents with bogus signatures of SSP/Traffic, DPO Nowshera, DSP/Traffic HQrs, RI Traffic Lines, Reader to SSP/Traffic and Medical Superintendents of different hospitals and illegally enjoyed leave for all the above period.

4. By doing this you have committed gross misconduct on your part.



5. AND I hereby direct you further under Rule 6 (I) (b) of the said Rules to put-in written defence within 07-days of the receipt of this Charge Sheet as to why the proposed action should not taken against you and also state whether you desire to be heard in person.

6. AND in case your reply is not received within the stipulated period to the enquiry officer, it shall be presumed that you have no defence to offer and in that case, ex-parte action will be taken against you.


(SADIQ HUSSAIN) PSP
Senior Superintendent of Police,
Traffic, Peshawar.

(Competent Authority)

ایک ملاد چارج شیٹ
دوسری آف ایگنیشن وصول کیا۔



3/6/16
فائل نوڈ وصول کیا۔

attested
18

کاپی ملاد
Khalid Khan
8161016

DISCIPLINARY ACTION

1. I, **SADIQ HUSSAIN**, Senior Superintendent of Police, Traffic, Peshawar as competent authority, am of the opinion **HC Khalid Khan No.5610/10** has rendered himself liable to be proceeded against, as he committed the following acts/omission within the meaning of section 03 of Police Rules 1975.


SUMMARY OF ALLEGATIONS

i) That from 14.10.2015 to 03.06.2016 (231-days) he has submitted bogus medical documents with bogus signatures of SSP/Traffic, DPO Nowshera, DSP/Traffic HQrs, RI Traffic Lines, Reader to SSP/Traffic and Medical Superintendents of different hospitals and illegally enjoyed leave for all the above period.

3. For the purpose of scrutinizing the conduct of the said accused official with reference to the above allegations, an Enquiry Committee comprising of the following officer(s) is constituted:-

- a. Mr. Habibullah, SP/HQrs. Traffic, Peshawar.
- b. Mr. Riaz Ahmad, SP/Cantt. Traffic, Peshawar.

4. The enquiry committee/officer shall in accordance with the provision of the Police Rules 1975 provide reasonable opportunity of hearing to the accused officer/official and make recommendations as to punishment or any other appropriate action against the accused.


(SADIQ HUSSAIN) PSP
Senior Superintendent of Police,
Traffic, Peshawar.

(Competent Authority)

attested
18/11

طال کر اور لے والے کا نام لکھا گیا ہے

7

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SP/Case EO
Access
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(Annex: C)
(7)

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DEPARTMENTAL ENQUIRY AGAINST HC KHALID KHAN

This is a departmental enquiry against HC Khalid Khan No. 5610/10 of Traffic Peshawar. It is alleged that HC Khalid Khan No. 5610/10 while posted to Traffic Peshawar from 14.10.2015 to 03.06.2016 (231-days) submitted bogus medical documents with fake signatures of SSP/Traffic, DPO Nowshera, DSP/Traffic HQrs, RI Traffic Lines, Reader to SSP/ Traffic and Medical Superintendents of different hospitals and illegally enjoyed leave for all the above period i.e 231-days.

In this connection the accused officer was served with charge sheet/summary of allegations, placed under suspension on the above mentioned charges, his salary was stopped and an enquiry committee consisting of the following officers was constituted vide SSP/Traffic Peshawar Order No. 569-73/PA dated 03.06.2016.

1. Mr. Habib Ullah Khan, SP/HQrs Traffic, Peshawar.
2. Mr. Riaz Ahmad, SP/Cantt Traffic, Peshawar.

The accused officer Khalid Khan No. 5610/10 in his reply to the charge sheet stated that during his 19/20 Years service, he has not given any chance of complaint to his seniors and rebutted the charges leveled against him. He stated that he is patient of Typhoid and regularly attending the doctor for treatment. He showed his ignorance to have submitted any incorrect/illegal application to the high-ups for genuine illness. He has requested that the departmental enquiry initiated against him may be filed.

To scrutinize the conduct of accused officer the statement of HC Khalid Khan No. 5610/10 as well as following police officers/PWs were recorded.

- ✓ 1. Wahid Mehmood PSP, the then SSP Traffic, Peshawar now DPO Nowshera.
- ✓ 2. Sadiq Hussain PSP, SSP Traffic, Peshawar.
- ✓ 3. HC Khalid Khan No. 5610/10 of Traffic Staff.
- ✓ 4. Zaka Ullah, RI Traffic, Peshawar.
- ✓ 5. Ajmal Khan, Line Officer, Traffic, Peshawar.
- ✓ 6. HC Nawab Khan, MM Traffic Line, Peshawar.
- ✓ 7. Rahim Hussain, DSP/HQrs, Traffic, Peshawar.
- ✓ 8. ASI Tariq Ahmad, Reader DSP/HQrs, Traffic, Peshawar.
- ✓ 9. HC Fayaz Ahmad No. 215, Ex-MM Traffic Line, Peshawar.

✓ In his written statement **Mr. Wahid Mehmood, PSP DPO Nowshera** has stated that he has perused the attached enquiry papers initiated against HC Khalid Khan No. 5610/10 and all the signatures of the undersigned (Wahid Mehmood) were found bogus.

Mr. Sadiq Hussain SSP Traffic, Peshawar stated in his written statement that HC Khalid Khan No. 5610/10 has absented himself from duty w.e.f 14.10.2015 to 03.06.2016 (total period of 231-days) and arranged bogus

attested.
19/7

(9)

medical certificates to cover his prolonged absence. Further narrated that the accused official has also managed his bogus signatures for a number of times and always made his departure from the Daily Diary by showing that bogus signatures/approval of the undersigned to the Roznamcha Staff.

HC Khalid Khan No. 5610/10 stated in his statement that his reply to the charge sheet may be treated as his statement in which he wants no amendment, addition or deletion.

In reply to a court question by the members of enquiry committee that whether he has enjoyed the mentioned leave, he replied in positive.

In reply to another court question that whether he has personally handed over the mentioned leave application and forwarded by the senior officers, he replied in positive.

During other court questions he admitted that he is granted leave & medical leave by the officers, however showed his ignorance about submission of bogus applications and said that he was ill.

Inspector Zaka Ullah Khan, RI Traffic stated in his statement that none of his real signature exists on the leave applications of accused officer and said that all his signature on the applications of accused officer are totally bogus.

Ajmal Khan, Line Officer Traffic stated in his statement that except medical leave applications of dated 14.10.2015, 22.10.2015 and 06.11.2015 all his signature on the remaining applications of accused officer are fake.

HC Nawab Khan, MM Traffic Line stated in his statement that his entire signatures on the medical leave applications of accused officer are bogus.

Rahim Hussain, DSP/HQrs, Traffic disclosed in his statement that except medical leave applications of dated 14.10.2015 and 22.10.2015 all his signature available on the applications of accused officer are fake. Further said that the official stamp pasted on the applications of accused official have no link with reality and counterfeit.

ASI Tariq Ahmad, Reader DSP/HQrs, Traffic supported the version of DSP/HQrs Traffic to the extent of bogus official stamp.

HC Fayaz Ahmad, Ex-MM Traffic Line stated in his statement that except medical leave applications of dated 14.10.2015, 22.10.2015 and 06.11.2015 all his signatures on the remaining applications are bogus.

To verify the medical certificates/OPD Chits, Medical Superintendent Police Service Hospital Peshawar was approached vide this office letter No. 84/R dated 06.06.2016 who reported vide his office memo no. 2765/MS/Admin/2015-16 dated 07.06.2016 that medical OPD chits in respect of HC Khalid Khan No. 10 is totally bogus. Further reported that the stamps and signatures of SMO and medical superintendent have not been verified and found bogus.

Similarly to verify the medical certificates/OPD Chits, Medical Superintendent Khyber Teaching Hospital Peshawar was approached vide this office letter No. 84/R dated 06.06.2016 who reported vide his office memo no. 1561/RMO/KTH dated 10.06.2016 that as per report of the Registrar Medical "C" Unit there are no medical officer in medical "C" Unit KTH. All the trainees' medical officer, registrar stamps are at their names i.e by name stamps. He

attested
10/1

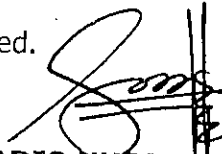
(Annex : E) (11)

FINAL SHOW C

E

(Under Rules 5 (3) KPK Police Rules 1975)

1. I, **SADIQ HUSSAIN**, Senior Superintendent of Police, Traffic Peshawar as competent authority under Police Disciplinary Rules (amended in 1975), do hereby serve you **HC Khalid Khan No.10/5610** as follows;
 - a. That from 14.10.2015 to 03.06.2016 (231-days) you have submitted bogus medical documents with bogus signatures of SSP/Traffic, DPO Nowshera, DSP/Traffic HQrs, RI Traffic Lines, Line Officer, Reader to SSP/Traffic and Medical Superintendents of different hospitals and illegally enjoyed leave for all the above period.
2. That consequent upon the completion of enquiry conducted against you by SP/HQrs. and SP/Cantt. Traffic Peshawar for which you were given full opportunity of hearing but you failed to satisfy the enquiry officer.
3. On going through the finding and recommendation of the enquiry officer/committee, the material available on record, I am satisfied that you have committed the omission/commission specified Police Disciplinary Rules (amended in 1975).
4. As a result therefore, I, **SADIQ HUSSAIN**, Senior Superintendent of Police, Traffic Peshawar as competent authority have tentatively decided to impose major penalty upon you including dismissal from service under Police Disciplinary Rules (amended in 1975).
5. You are therefore, directed to show cause as to why the aforesaid penalty should not be imposed upon you.
6. If no reply to this show causè notice is received within seven days of its delivery in the normal course of circumstances, it shall be presumed that you have no defense to put and in that case an ex-parte action shall be taken against you.
7. A copy of the finding of the Enquiry Officer is enclosed.


(**SADIQ HUSSAIN**) PSP
Senior Superintendent of Police,
Traffic, Peshawar.

attested


O/c
16/6/2016

خانہ نمبر 1046
Hc

خانگی

حوالہ نمبر 1046/مشیٹ/شوکار خوش قراری دفتر
مدرسہ صفت بھول

سائل نمبر 30 بمقام لکھنؤ میں لکھنؤ
ادریبی فرانس خوش اسلوبی اور اعجازی لکھنؤ
سراجام دیا گیا ہے۔

خانہ نمبر 1046 اللہ گواہی کے سائل مشدیدی بیانی کی وص
سے تاریخ 14.10.2015 سے افسانہ صاحب کی حضور
مذکورہ سائل پر موجود فریضہ اور اس کی صورت دینی پر
اسی فرانس دوبارہ سے سراجام دینا چاہیے

صلوات کی سائل میں سائل فکری طور پر مشدیدی
Senior میں آئی ہوگی اس لیے اس کی کوئی
گناہ کی صورت میں کرنا ہے اور اس کو صحیح کرنا ہے
اس لیے جو جو چھوٹے بچوں اور بچوں کے والدین کا وادہ ہے
اور اسے کتابت کی ذمہ داری ہے اس کے تدریس پر
اس لیے اس کا عاقلانہ استدعا ہے اس کے سائل کو صحیح
تخلیہ کی روٹی داخل دست کر کے اور سائل میں ہم نے
اسی کلمات صادر فرمائیں گے

Annex

all text
187

ORDER

This is an order on the departmental enquiry initiated against Head Constable Khalid, Khan No.5610/10 for producing bogus medical documents from 14.10.2015 to 03.06.2016 (total 231-days) with bogus signatures of SSP/Traffic, DPO Nowshera, DSP/Traffic Hqrs, RI and Line Officer Traffic Lines, Reader to SSP/Traffic and Medical Superintendents of different hospitals and illegally enjoyed leave for all the 231-days. The accused official was placed under suspension vide this office endst. No.569-73/PA, dated 03.06.2016 and charge sheeted. An enquiry committee comprising of Mr. Habibulah, SP/HQrs. and Mr. Riaz Ahmad, SP/Cantt. Traffic was constituted to conduct formal departmental proceedings against the accused official and submit findings within the stipulated period.

2. During the course of enquiry, statements of all the concerned/relevant officers/officials were recorded who categorically denied and declared their signatures as bogus. DSP/Hqrs. further added that the official stamp/seal found on his applications is also not being used by his office and illegally prepared by the accused official to fraudulently use for bogus signatures.

3. M.S. Services Hospital, Peshawar declared all the medical receipts as bogus vide his letter No.2765/MS/Admn 2015-16, dated 07.06.2016. RMO, Khyber Teaching Hospital, Peshawar also disclosed vide letter No.1561/RMO/KTH, dated 10.06.2016 that all the medical certificates in respect of the accused official were found bogus and illegal.

4. The enquiry committee in his findings recommended him for major punishment as the allegations have been proved without any shadow of doubt.

5. On 16.06.2016 the accused official was heard in OR to defend himself but he failed to produce cogent reason in support of all the allegations. Therefore, he was issued Final Show Cause Notice with last opportunity for defence.

6. Today (on 21.06.2016) he submitted reply to the Final Show Cause Notice which was also found not satisfactory so he was again heard in person. But he again failed to produce any evidence in support of the allegations leveled against him.

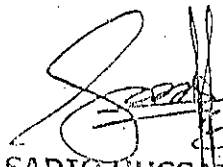
7. From perusal of his previous service record, it was also found that the accused official is a habitual absentee and found of regularly absenting himself for no reason. There are 07 bad entries found in his service record for absenting himself on different occasions out of which once he had absented himself from duty for 87-days (from 21.06.2013 to 16.09.2013) and the competent authority awarded punishment of forfeiture of 02 years approved service.

attested.
[Signature]

(14)

8. Keeping in view the recommendations of the Enquiry Officer, his blemish service record as well as causing financial loss to the national exchequer by fraudulently enjoying illegal leave, I am of the opinion that his retention in the force will badly affect his other colleagues. Therefore, HC Khalid Khan No.5610/10 is hereby dismissed from service under the Khyber Pakhtunkhwa Police Rules 1975 with immediate effect and the period he remained absent i.e. 14.10.2015 to 03.06.2016 (total 231-days) is treated as without pay.

Order announced.


(SADIQ HUSSAIN) PSP
Senior Superintendent of Police,
Traffic, Peshawar.

No. 643-48/PA, Dated Peshawar the 21-6-2016.
Copies for information and necessary action to:-

1. The CCPO, Peshawar. .
2. DSP/Hqrs. Traffic, Peshawar.
3. OSI
4. Accountant with the direction to recover Rs.280147/- form the accused and deposit the same in the government treasury as per law.
5. EC
6. SRC (along-with complete enquiry file consisting of ⁴⁷50 pages)

(SADIQ HUSSAIN) PSP
Senior Superintendent of Police,
Traffic, Peshawar.

affected
if

S

S
of

اپیل برائے بحالی نوکری بحیثیت ASI No 228-UB
22-7-2016

07-384-PA-CCPO
18-7-16
Encl: Rail + S. Book

مضمون FM

کمیٹی کے رکن اور سربراہ
بخدمت جناب CCPO صاحب پشاور
سرگرمیوں کے لئے
جناب عالی!

عاجزانه التماس ہے کہ سائل بحیثیت ASI ٹریفک وارڈن پولیس پشاور میں تعینات تھا۔ اور مورخہ 14.10.2015 سے آفران بالا کی منظور شدہ میڈیکل لیو پر گھر خود پر آرام کرتا رہا۔ بعد از صحت یابی اپنی فرائض کے انجام دہی کے لیے آتا رہتا ہم بیماری کچھ ایسی تھی جسکی وجہ سے سائل وقتاً فوقتاً دوبارہ علیل ہوتا گیا۔ اور سائل آفران سے وقتاً فوقتاً میڈیکل ریست منظور کرتا گیا۔ میرے ریست میں آفران صاحبان نے انکو آڑی کی۔ جسمیں جناب SSP ٹریفک نے مجھے چارج شیٹ نمبر 569-73/PA مورخہ 03.06.2016 جاری کی اور بعد از چارج شیٹ سائل کو بحوالہ آرڈر نمبری 643-48/PA مورخہ 21.06.2016 کو نوکری سے Dismissed کرنے کے احکامات صادر کیئے۔

جناب عالی!

عاجزانه التماس ہے کہ سائل ایک غریب گھرانے / کنبہ کا سربراہ ہے اور چھوٹے چھوٹے بچوں کی کفالت کرتا ہے۔ جسکا ذریعہ معاش صرف اور صرف میری نوکری تھی۔ جس دن سے سائل کا ذریعہ معاش چھینا گیا ہے، سائل کے گھر پر بھوک اور افلاس نے ڈیرے جمائے رکھے ہیں۔

محترم صاحب:- سائل عاجزانه درخواست کرتا ہے کہ سائل کے بچوں پر رحم کر کے سائل کو اپنے نوکری پر بحال کرنے کے احکامات جاری کریں۔

سائل اور سائل کے اہل و عیال اس مہربانی پر تاحیات دُعا گور ہیں گے۔

DSP-L

For comment Plz.

المرقوم:- 14.07.2016

العارض

آپکا تابع فرمان ASI خالد خان نمبر 10 متعینہ ٹریفک سٹاف پشاور

موبائل نمبر - 9320015 - 0313

attested
18/7

b
for ceo



(Annex: I)
**OFFICE OF THE
CAPITAL CITY POLICE OFFICER, (16)
PESHAWAR**

Phone No. 091-9210989
Fax No. 091-9212597

ORDER

This order will dispose off departmental appeal preferred by ex-IHC **Khalid Khan No.5610/10** who was awarded the major punishment of **Dismissal** under PR-1975 vide No.643-48/PA dated 21.6.2016 by SSP-Traffic, Peshawar.

2- Short facts behind the instant appeal are that the appellant while posted at Traffic Unit Peshawar was proceeded departmentally on the charge of producing bogus medical documents from different hospitals with fake signatures of SSP-Traffic, DSP-Traffic, RI-Traffic, L.O-Traffic, Reader to SSP-Traffic and illegally enjoyed leave w.e.f 14.10.2015 to 3.6.2016 (**Total-231 days**).

3- Proper departmental proceedings were initiated against him and a committee comprising of Mr. Habib Ullah, SP-IIQrs: Traffic, and Riaz Ahmad SP-Cantt: Traffic was constituted. During the course of enquiry, statements of all the concerned/relevant officers/officials were recorded who categorically denied and declared their signatures as bogus. DSP/HQrs: further added that the official stamp/seal found on applications of the appellant is also not used by his office and illegally prepared by the accused official to fraudulently use for bogus signatures. M.S, Services Hospital, Peshawar declared all the medical receipts as bogus vide his letter No.2765/MS/Admn 2015-16, dated 7.6.2016. RMO, Khyber Teaching Hospital, Peshawar also disclosed vide letter No.1561/RMO/KTH, dated 10.6.2016 that all the medical certificates of the accused official were found bogus and illegal. The enquiry Committee established the allegations against him and recommended him for award of major punishment. On receipt of the findings of the enquiry committee, the SSP-Traffic Peshawar issued him FSCN to which he replied. The same was perused and found unsatisfactory, as such awarded him the above major punishment.

4- The appellant was called in O.R and heard him in person on 16.11.2016. The enquiry papers were thoroughly examined. He was provided full opportunity to defend himself but he miserably failed to produce any cogent reason in his favour. The allegations levelled against him stand proved. His retention in police department is not justifiable and will badly effect on other police officials. The order passed by SSP-Traffic Peshawar is upheld. His appeal for re-instatement in service is **rejected/iled**.

(MUHAMMAD TAHIR) PSP
CAPITAL CITY POLICE OFFICER,
PESHAWAR

No. 2015-20 /PA dated Peshawar the 17/11/ 2016

Copies for inf and n/a to the:-

- 1/ SSP/Traffic: Peshawar.
- 2/ PO/OASI/~~Ec-II~~ along with S.Roll for making necessary entry in his S.Roll.
- 3/ FMC along with FM
- 4/ Official concerned.

altered

Annex: J
(17)

Khyber Teaching Hospital, Peshawar OUT - PATIENTS DEPARTMENT

RS. 10/-



S.No: 19037

7248430216

CASUALTY

KHALID
MALE
10-FEB-16
HAMAYUN

RS.10
40 YEARS
15:50:30
PESHAWAR

Typhoid
TH 160/
To 110
B.P 170/100
Body
Pain

Tabs. Calab. 5mg
 iv @ od
Tabs. Zantac 300
 iv @ od
Tabs. Metformin
 iv @ od
Tabs. Aspirin 200mg
 iv
Tabs. Paracetamol
 iv

Farooq

Medical Superintendent
K.T.H Hospital
Peshawar

Advise complete Bed
Rest for Two weeks

[Signature]
Senior Medical Officer
K.T.H Hospital
Peshawar
10/2/16

attested.
[Signature]

Khyber Teaching Hospital, Peshawar

OUT - PATIENTS DEPARTMENT

RS: 40/-



S.No: 8533

6209331215

CASUALTY

KHALID
 MALE
 11-DEC-16
 AKHTAR HUSSAIN
 NORMAL

RS.10
 38 YEARS
 11:13:22
 PESHAWAR

SGM

48

Tab. Entover 20
Cap - Evin Group 20
Sup. Tetapay ①
2 + 2 TBs
2 + 2 TBs
Tab. Terned group ①
2 + 2 TBs
Tab. Terned group ①
2 + 2 TBs

Ward 48
Ti - 160
To - 140
Quins
Headache
Worsening
Jever
Case

Advised complete bed rest -
②
two weeks

Stamp: KHYBER TEACHING HOSPITAL PESHAWAR

attested.
187

Khyber Teaching Hospital, Peshawar

OUT - PATIENTS DEPARTMENT

19

RS: 10/-



S.No: 126866

6466991215

CASUALTY

KHALID
MALE
28-DEC 15
KALIM RAZA
NORMAL

RS. 10
30 YEARS
15:10:20
PESHAWAR

Low
Teh. Subvex 20
1 + 1
Cap. Ewan 100 mg 20
2001
Syp. Lysavik D
1 + 1 + 1
Syp. Jekifer
a + 10 + 10
Teh. Terivical 100 mg

Syp. 40
W. 200 +
H. 200
B. 200
V. 200
W. 200
E. 200
T. 100
To 100
Pain

Allow complete Bed Rest
for two weeks

Send Medical Officer
Khyber Teaching Hospital
Peshawar

attest
Dr

Khyber Teaching Hospital, Peshawar

OUT - PATIENTS DEPARTMENT

Rs: 10/-



63580

S.No: _____

Patient ID: 4096111015

OPD

Name: KHALID

Gender: MALE

42 YEARS

Rate: 10

Referred To: MEDICINE

Date: 07-OCT-15

Time: 11:08:45

Address: PESHAWAR

Em *Pain chest*

bow

① T9/10 +

② X-ray chest AB

③ LFT, + P

④ T upint, + P

⑤ ESR Blood

R
lay TARAVID
141 x 15 days

Two days *band + R.*
12-14

la *Secret*
10/10/15

Ad Bed Rest for 02 weeks
on 7/10/15
will dis.

Medical Officer
M.C. Ward
K.T.H. Peshawar

attested
RF

(20)



SERVICES HOSPITAL PESHAWAR
GOVERNMENT OF KHYBER PAKHTUNKHWA
OPD REGISTRATION

Rs. 5/-

Name _____ Age _____ Sex _____
 Department _____ Address _____
 Hospital Yearly No. _____ Dated _____

History
 RR 180/90
 chole 210

Clinical Examination
 To - 11/01/16
 To - 10/12/15

Provisional Diagnosis
 Pain in
 New = chest
 by blood

Investigations
 Myo
 Pank
 2cc

R/-

Tah

Tenormin - 100mg
 1 + 1

Tah - Elbow

Tah - Cap

Tah - Pain to elbow

Tah - Dupuytren's contracture
 5/3

hona bechert
 11/01/2016

Medical Superintendent
 Police Station
 District
 Peshawar

Doctor on Duty _____ Doctor's Signature _____
 Senior Medical Officer
 Services Hospital
 Peshawar

attested
IPF

Khyber Teaching Hospital, Peshawar

OUT - PATIENTS DEPARTMENT

22

Rs: 10/-



S.No: 110846

Patient ID: 4338961015 OPD
Name: KHALID
Gender: MALE 37 YEARS Rate: 10
Referred To: MEDICINE
Date: 22-OCT-15 Time: 11:43:39
Address: PESHAWAR

youlaa dar edroo...
Ad. ① 96.21
② 142517
Hct by El...

27

56.1 9.8
Td selivv 4-125
1+

GP EV in bed
1+

hN Leder Alex
10-11

hN Judojod
10-11
Advice complete rest rest bed
2 weeks of 22-10-15

Med. Officer
[Signature]

attested
[Signature]

Khyber Teaching Hospital, Peshawar

OUT - PATIENTS DEPARTMENT

Rs: 10/-



S.No: 189880

Patient ID: 4537761115

OPD

Name: KHALID KHAN

Gender: MALE

36 YEARS

Rate: 10

Referred To: MEDICINE

Date: 05-NOV-15

Time: 12:10:37

Address: PESHAWAR

Handwritten notes:
B
Khan, Khalid Khan
Peshawar
2/10/15
Purchase

Handwritten notes:
Ca Ampicillin & on back
Pat H.H.

Handwritten notes:
Ca Revision
2/10/15
by Ladar Pleat
with 6 cases in

Handwritten notes:
by Sulek P
- 12/10/15
by Sulek P
with 2 cases in

Handwritten signature:
attested
[Signature]

to, Salwan in (C)
1+1

Ad Bed Rest
Two weeks on

Medical Officer
M. C. Ward
R. H. Bhowar.

5711



Khalid Khan 2 بنجاب
Ex. Head Constable بنام
16 P/PP0 and others

16-12-2016 مورخہ

Khalid Khan مقدمہ
Service Appeal دعویٰ
جزم

باعث تحریر آنکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کاروائی متعلقہ
آن مقام Peshawar کیلئے Shahzada Irfan Zia Adw
مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز
وکیل صاحب کو راضی نامہ کرنے و تقرر ثالث و فیصلہ پر حلف دیئے جواب دہی اور اقبال دعویٰ اور
بصورت ڈگری کرنے اجراء اور وصولی چیک دروپیہ ارضی دعویٰ اور درخواست ہر قسم کی تصدیق
زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی
اور منسوخی نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا۔ از بصورت ضرورت
مقدمہ مذکور کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے
تقرر کا اختیار ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ با اختیار است حاصل ہوں گے
اور اس کا ساختہ پر داخستہ منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ کے
سب سے وہوگا۔ کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں
گے۔ کہ پیروی مذکور کریں۔ لہذا وکالت نامہ لکھ دیا کہ سندر ہے۔

Accepted

18
am

Shahzada Irfan Zia
خالد خان

المرقوم 16th ماہ Dec 2016

الع د گ واہ الع
مقام Peshawar کے لئے منظور ہے۔

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PEASHAWAR.

Service Appeal No. 1240/2016.

Khalid Khan Ex-Head Constable (Appellant)

Versus

Provincial Police Officer and others (Respondents)

Subject:- COMMENTS ON BEHALF OF RESPONDENTS.

PRELIMINARY OBJECTIONS:-

- a) The appeal has not been based on facts.
- b) The appellant is estopped to file the appeal.
- c) The appeal is barred by law and limitation.
- d) The appellant has got no cause of action to file the present appeal.
- e) The appeal is bad for mis-joinder and non-joinder of necessary parties.
- f) The appellant has not come to the Honorable Tribunal with clean hands.

FACTS:-

1. Incorrect, charge sheet, and statement of allegation based on charges of manipulating and concocting bogus medical documents with forged signatures of SSP/Traffic, DPO Nowshera DSP/Traffic Headquarters, Reserve Inspector, Reader to SSP Traffic and Medical Superintendents of different Hospitals produced by the appellant for availing illegal medical leave for substantiating his wilfull and deliberate long absence from duty was issued to appellant. Appellant submitted reply in response to the charge sheet which was found unsatisfactory. Copy of the charge sheet, statement of allegation reply of appellant in response to the charge sheet are already enclosed as Annexure-A, B, C and D with the original appeal.
2. Incorrect, inquiry committee constituted for scrutinizing the conduct of appellant with reference to the charges leveled against him, conducted detailed inquiry and submitted finding report to the effect that the charges leveled against the appellant were proved. The inquiry committee in addition to examination of record also examined eight (08) witnesses. Copy of the finding of inquiry committee is already enclosed as Annexure-D with the original appeal. Furthermore, Medical Superintendents Khyber Teaching

Hospital Peshawar was approached vide letter No. 84/R dated 06.06.2016 for verifying the medical certificate and OPD Chits produced by the appellant reply was received vide memo No. 1561/R and O/KTH dated 10.06.2016 wherein all the certificate and OPD Chits were reported bogus and forged. Copies of the letter are enclosed as Annexure-A and B respectively.

3. Incorrect, Final show cause notice based on the finding of inquiry committee was issue to appellant and his reply received in response to the show cause notice was found unsatisfactory. The impugned order was passed in the light of finding report of the inquiry committee. Copy of the final show cause notice, reply of appellant and impugned order are already enclosed with original appeal as Annexure-E, F and G.
4. Incorrect, the appellate authority passed speaking order in the departmental appeal of appellant. Appellant was heard in person. Appellant failed to defend the charges. Copy of the order of the appellate authority and departmental appeal are already enclosed with the original appeal as Annexure-H and I. The original authority as well as the appellate authority have passed speaking orders in the disciplinary proceeding initiated against appellant. All the legal and codal formalities were adopted before passing the impugned orders. Therefore the appeal of appellant is not maintainable.

GROUND:-

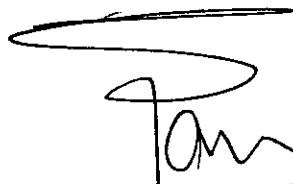
- a. Incorrect, according to the inquiry report appellant admitted availing unsanctioned and illegal leave. He also admitted producing and handing over the bogus and forged documents before the authorities. Almost all the witnesses examined by the committee denied their signatures on the documents produce by the appellant for substantiating his long wilfull and deliberate absence from duty.
- b. Incorrect, the inquiry committee confronted the witnesses with their alleged signatures on the documents produced by the appellant and all of them straight away stated that their signatures were forged by the appellant.
- c. Incorrect, according to the finding of inquiry committee Medical Superintendents Khyber Teaching Hospital Peshawar was approached vide letter No. 84/R dated 06.06.2016 for verifying the

medical certificate and OPD Chits produced by the appellant. Reply was received vide memo No. 1561/R and O/KTH dated 10.06.2016 wherein all the certificate and OPD Chits were reported bogus and forged.

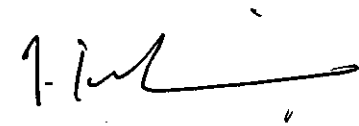
- d. Incorrect, the inquiry committee examined relevant persons who's forged signatures were put on the documents by appellant and all of them stated that the signatures were not genuine and the documents bears their forged signatures. Since the forgery committed by appellant was proved. Therefore there was no need of expert opinion.
- e. The respondents may also allowed to raised other point during hearing of the appeal.

PRAYERS:-

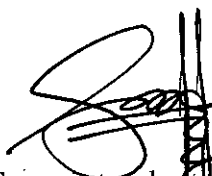
It is therefore, prayed that the appeal of appellant may be dismissed with costs.



Provincial Police Officer,
Khyber Pakhtunkhwa, Peshawar.
(Respondent No. 1)



Capital City Police Officer,
Peshawar
(Respondent No. 2)



Senior Superintendent of Police,
Traffic, Peshawar.
(Respondent No. 3)

**BEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA
PESHAWAR.**

SERVICE APPEAL NO. 1240 OF 2016.

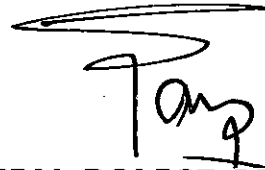
Ex-Head Constable Khalid Khan No. 5610..... Plaintiffs

VS

Provincial Police Officer KPK, Peshawar etc..... Defendants.

AFFIDAVT.

We respondents No. 1,2 & 3 do hereby solemnly affirm and declare that the contents of the written reply are true and correct to the best of our knowledge and belief and nothing has concealed/kept secret from this Honorable Tribunal.



**PROVINCIAL POLICE OFFICER,
KHYBER PAKHTUNKHWA,
PESHAWAR**



**CAPITAL CITY POLICE OFFICER,
PESHAWAR.**



**SENIOR SUPERINTENDENT OF POLICE,
TRAFFIC, PESHAWAR.**

From: The Superintendent of Police,
Cantt, Traffic, Peshawar.

To: The Medical Superintendent, KTH Peshawar.

No: 84 /R. dated Peshawar the 06/06/2016.

SUBJECT: VERIFICATION.

Memo

It is submitted that HC Khalid No.10 of this Unit has produced Medical Certificates about his illness.

It is, therefore requested that the instant Medical Certificates may please be verified either it is genuine or otherwise.

Medical Certificates are enclosed herewith, which may please be returned to this office after verification.

o/c

Superintendent of Police,
Cantt: / Traffic, Peshawar.

KHYBER TEACHING HOSPITAL PESHAWAR

NO. 1561 /RMO/KTH.

DATED. 10/6/2016.

To: The Superintendent of Police,
Cantt, Traffic, Peshawar.

Subject: VERIFICATION OF MEDICAL LEAVE CERTIFICATE

memo:

Reference to your letter No. 84/R dated 06.06.2016 on the above cited subject.

It is intimated that as per the report of the Registrar Medical "C" Ward there are no medical officer in medical "C" Unit KTH. All the trainees medical officer registrar stamps are at their names i.e By name stamps.

All medical certificates received under letter are thoroughly checked and it is found that the medical certificates are totally bogus and as well illegal.

(Photo copy of the statement of Registrar Medical "C" ward is attached)

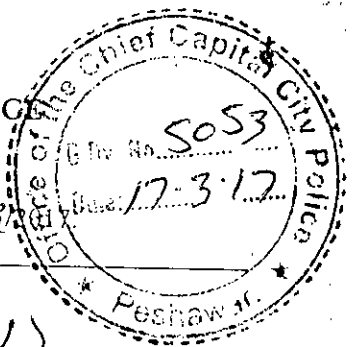
[Signature]
Resident Medical Officer,
MTI, Khyber Teaching Hospital,
Peshawar



120F
20/19/2018
20/1891

OFFICE OF THE
INSPECTOR GENERAL OF POLICE
KHYBER PAKHTUNKHWA
PESHAWAR.

17, dated Peshawar the 16/03/2017



ORDER

PA/HQrs No. 1835

Date..... 20/3/17

This order is hereby passed to dispose of departmental appeal under Rule 11-A of Khyber Pakhtunkhwa Police Rule-1975 submitted by Ex-Head Constable Khalid Khan No. 5610/10. The appellant was dismissed from service by SSP/Traffic, Peshawar vide order Endst: No. 643-48/PA, dated 21.06.2016 on the allegation that he while posted at Traffic Unit Peshawar was proceeded departmentally on the charge of producing bogus medical documents from different hospitals with fake signature of SSP/Traffic, DSP/Traffic, RI/Traffic, L.O/Traffic, Reader to SSP/Traffic and illegally enjoyed leave w.e.f 14.10.2015 to 03.06.2015 for a period of 231 days.

His appeal was rejected / filed by CCPO, Peshawar vide order Endst: No. 2015-20/PA, dated 17.11.2016.

Meeting of Appellate Board was held on 16.02.2017 wherein appellant was heard in person. During hearing petitioner contended that he did not commit forgery.

In view of long service about 21 years at the credit of petitioner, the Board decided that the petitioner is hereby re-instated into service and the penalty of dismissal from service is modified into major penalty of reduction to time scale for two years. He is warned to be careful in future. The intervening period shall not be counted towards duty. He will remain under special watch for one year.

This order is issued with the approval by the Competent Authority.

PO/CPD/ST/32

Rv MA

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(NAJEEB-UR-REHMAN BUGVI)
AIG/Establishment,
For Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar.

No. SI/1892-1900/17

Copy of the above is forwarded to the:

1. Capital City Police Officer, Peshawar.
2. SSP, Traffic, Peshawar.
3. PSO to IGP/Khyber Pakhtunkhwa, CPO Peshawar.
4. PA to Addl: IGP/HQrs: Khyber Pakhtunkhwa, Peshawar.
5. PA to DIG/HQrs: Khyber Pakhtunkhwa, Peshawar.
6. PA to AIG/Legal, CPO Peshawar.
7. Office Supdt: E-IV CPO Peshawar.
8. Central Registry Cell, CPO.

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CCPO Peshawar
17/3